

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

IRAN NOTICE OF
AMENDMENT

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This document relates to: Ashton et al v. al Qaeda Islamic Army, et al.,

No. 02-CV-6977(GBD)(SN) .

Plaintiffs file this Notice of Amendment with respect to the underlying Complaint in the above-referenced matter, ECF No. 3237, as permitted and approved by the Court's Order of July 10, 2018, ECF No. 4045. Upon the filing of this Notice of Amendment, the underlying Complaint is deemed amended to add the individual(s) listed below (the "New Plaintiff(s)") as plaintiff(s) raising claims against the Islamic Republic of Iran. The underlying Complaint is deemed amended to include the allegations, as indicated below, of (a) the Federal Insurance and Ashton Plaintiffs' Amended Consolidated Complaint Against Defendant, the Islamic Republic of Iran, ECF No. 3237, or (b) the Amended Complaint, Burnett v. Islamic Republic of Iran, No. 15-CV-9903 (GBD)(SN) (S.D.N.Y. Feb. 8, 2016), ECF No. 53. The amendment effected through this Notice of Amendment supplements by incorporation into, but does not displace, the underlying Complaint. This Notice of Amendment relates solely to the Islamic Republic of Iran and does not apply to any other defendant.

Upon filing this Iran Notice of Amendment, each New Plaintiff is deemed to have adopted all factual and jurisdictional allegations of the complaint that has been joined as specified below; all causes of action contained within that complaint; all prior filings in

connection with that complaint; and all prior Orders and rulings of the Court in connection with that complaint.

Additionally, each New Plaintiff incorporates the factual allegations and findings contained in those pleadings and orders filed at Havlish v. Bin Laden, No. 1:03-CV-9848 (GBD)(SN) (S.D.N.Y.), ECF Nos. 263, 294, 295; In re Terrorist Attacks on September 11, 2001, 03-MDL-1570 (GBD)(SN) (S.D.N.Y.), ECF Nos. 2430, 2431, 2432, 2433, 2473, 2515, 2516; and evidence submitted at the proceedings before the Honorable George B. Daniels on December 15, 2011 (ECF No. 2540).

CAUSES OF ACTION

Each New Plaintiff hereby adopts and incorporates herein by reference all factual allegations, jurisdictional allegations, and jury trial demand, including all causes of action against Iran, as set forth in the following complaint [**check only one complaint**]:

- ☒ Federal Insurance and Ashton Plaintiffs' Amended Consolidated Complaint Against Defendant, the Islamic Republic of Iran, ECF No. 3237
- ☐ Amended Complaint, Burnett v. Islamic Republic of Iran, No. 15-CV-9903 (GBD)(SN) (S.D.N.Y. Feb. 8, 2016), ECF No. 53

IDENTIFICATION OF NEW PLAINTIFFS

Each New Plaintiff is or was a survivor of a person who died due to the terrorist attacks of September 11, 2001. For each New Plaintiff, the following chart lists the New Plaintiff's name, the New Plaintiff's residency and nationality, the name of the New Plaintiff's deceased family member, the New Plaintiff's relationship to the decedent, and the paragraph(s) of the underlying Complaint discussing the decedent and/or the decedent's estate.

	Plaintiff's Name (alphabetical by last name)	Plaintiff's State of Residency at filing (or death)	New Plaintiff's Citizenship/N ationality on 9/11/2001	9/11 Decedent's Name	New Plaintiff's Relationship to 9/11 Decedent	Paragraphs of Complaint Discussing 9/11 Decedent
1	Alger Wang, Cristina	NY	USA	Alger, David D.	Child	N/A
2	Alger, Josephine	NY	USA	Alger, David D.	Spouse	N/A
3	Anderson, Mary	NY	USA	Coppo, Jr., Joseph J.	Sibling	N/A
4	Clark, Lisa Dilallo	NJ	USA	Clark, Thomas R.	Spouse	N/A
5	Clark, Lisa Dilallo	NJ	USA	Clark, Thomas R.	Parent and legal guardian on behalf of W. C. C., minor child of 9/11 Decedent Thomas R. Clark	N/A
6	Clark, Matthew J.	NJ	USA	Clark, Thomas R.	Child	N/A
7	Coppo, III, Joseph	MD	USA	Coppo, Jr., Joseph J.	Child	N/A

	Plaintiff's Name (alphabetical by last name)	Plaintiff's State of Residency at filing (or death)	New Plaintiff's Citizenship/N ationality on 9/11/2001	9/11 Decedent's Name	New Plaintiff's Relationship to 9/11 Decedent	Paragraphs of Complaint Discussing 9/11 Decedent
8	Coppo, John	NY	USA	Coppo, Jr., Joseph J.	Child	N/A
9	Coppo, Matthew	OH	USA	Coppo, Jr., Joseph J.	Child	N/A
10	Coppo, Patricia	NY	USA	Coppo, Jr., Joseph J.	Spouse	N/A
11	Dolan, Samantha	CA	USA	Dolan, Brendan	Child	N/A
12	Dolan, Sarah	CA	USA	Dolan, Brendan	Child	N/A
13	Dolan, Stacey	CA	USA	Dolan, Brendan	Spouse	N/A
14	Ganci Cowan, Danielle	NY	USA	Ganci, Peter J.	Child	N/A
15	Ganci, III, Peter J.	NY	USA	Ganci, Peter J.	Child	N/A
16	Ganci, Kathleen	NY	USA	Ganci, Peter J.	Spouse	N/A
17	Harris, Craig	NJ	USA	Harris, Stewart D.	Child	N/A
18	Harris, Elissa	NJ	USA	Harris, Stewart D.	Child	N/A
19	Harris, Sheila	NJ	USA	Harris, Stewart D.	Spouse	N/A
20	Holland, IV, Joseph	NY	USA	Holland III, Joseph	Child	N/A
21	Holland, Kathleen	NY	USA	Holland III, Joseph	Spouse	N/A
22	Hussa, Kathryn J.	KS	USA	Hussa, Robert R.	Spouse	N/A

	Plaintiff's Name (alphabetical by last name)	Plaintiff's State of Residency at filing (or death)	New Plaintiff's Citizenship/N ationality on 9/11/2001	9/11 Decedent's Name	New Plaintiff's Relationship to 9/11 Decedent	Paragraphs of Complaint Discussing 9/11 Decedent
23	Hussa, Robert	KS	USA	Hussa, Robert R.	Child	N/A
24	Hussa, Thomas	KS	USA	Hussa, Robert R.	Child	N/A
25	Zapata, Kathleen N.	NY	USA	Coppo, Jr., Joseph J.	Child	N/A

Dated: November 27, 2018

Respectfully submitted,

KREINDLER & KREINDLER LLP

BY: /s/ James P. Kreindler
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